

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

ST. JUDE MEDICAL S.C., INC.,

Plaintiff,

v.

**LOUISE MARIE JANSSEN-
COUNOTTE,**

Defendant.

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CIVIL ACTION NO. 1:14-CV-00877-SS

**JOINT MOTION FOR ENTRY OF AMENDED CONFIDENTIALITY AND
PROTECTIVE ORDER IN ACCORDANCE WITH THE COURT'S ORDER OF
OCTOBER 30, 2015**

Plaintiff St. Jude Medical S.C., Inc. and Defendant Louise Marie Janssen-Counotte hereby jointly move the Court to enter the attached Amended Confidentiality and Protective Order, and would show the Court as follows:

The Court previously resolved the disagreement between the parties regarding certain terms in the proposed amended protective order. Order of Oct. 30, 2015 [#95]. Attached is a proposed amended protective order, which simply effectuates and memorializes the Court's rulings in a single document. For the sake of clarity, and to ensure non-parties (such as the parties' respective experts) are correctly governed in their handling of classified information, the parties jointly ask the Court to enter the attached order.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of November, 2015, a true and correct copy of the foregoing has been sent to the following counsel of record via CM/ECF filing:

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